

FERNALD te of Ohio Environmental Protection Agency Mar 29

Governor

George V. Voinovich

**Southwest District Office** 

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March 25, 1999

RE:

DOE FEMP

**COMMENTS: EXPERIMENTAL** 

**DESIGN FOR THE A8P1** 

REVEGETATION RESEARCH PLOTS

Mr. Johnny Reising

U.S. Department of Energy, Fernald Area Office

P.O. Box 538705

Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed the DOE's February 16, 1999 submittal, "Experimental Design For The A8p1 Revegetation Research Plots" Based upon our review Ohio EPA has the attached comments.

If you have any questions, please contact me at (937) 285-6466.

Sincerely

Thomas A. Schneider Fernald Project Manager

Office of Federal Facilities Oversight

cc:

Jim Saric, U.S. EPA Terry Hagen, FDF Ruth Vandegrift, ODH Manager, TPSS/DERR,CO Mark Shupe, HSI GeoTrans

Francie Barker, Tetra Tech EM Inc.

## EXPERIMENTAL DESIGN FOR THE AREA 8 PHASE I REVEGETATION RESEARCH PLOTS

1. Commenting Organization: Ohio EPA

Commentor: DSW

Section #:

Pg #: 1

Line #: 1st paragraph Code: E

Original Comment #:

Comment: The plots are referred to by number (e.g. Plot No. 3) and are shown in figure 1 as 1, 2 and 3, but are referred to in Table 1 as Plot A, B and C. These should be labeled in a consistent manner.

2. Commenting Organization: Ohio EPA

Commentor: DSW

Section #: Pg #: 1

Line #: 1st paragraph Code: C

Original Comment #:

Comment: The description of the reference plots is given as "even aged in origin and low in diversity". This description appears to fit a disturbed area. It seems unwise to use a disturbed or recently disturbed area as a reference. It would appear useful to use a stable, mature area as a reference. This appears to be a serious flaw.

3. Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Pg #: 1

Line #: 2<sup>nd</sup> paragraph Code: C

Original Comment #:

Comment: None of the species identified in the reference plots were green ash although blue ash was listed as one of the more dominant species. The range of blue ash is much more limited than that of green ash and it is found, like the chinquapin oak, in the limestone soils of southwest Ohio. Ohio EPA believes it would have been most appropriate to utilize blue ash rather than green ash in the research plots. In future restoration work, Ohio EPA expects a more diverse and appropriate list of trees to be utilized for reforestation work. Developing reference lists from undisturbed areas including the Hamilton County Parks, conservation easement area or even a review of original land survey data would have provided a better species list for restoration. At the March 11, 1999 Natural Resource Working Group meeting, Ohio EPA provided a list of tree species obtained from the 1818 Crosby Township land survey. We would expect to use this and other information sources for determining species lists for future restoration projects.

4. Commenting Organization: Ohio EPA

Commentor: DSW

Section #:

Pg #: 2

Line #: 3rd paragraph Code: C

Original Comment #:

Comment: Placing tubes on half the seedlings in a plot may act to protect the seedlings in the same plot without the tubes. These unusual objects may deter herbivory in their vicinity. It may be better to have an entire plot with seedlings in tubes and one without.

5. Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Table 2

Pg #: Line #:

Code:

Original Comment #:

Comment: The number of seedlings and saplings utilized as well as plot design have changed substantially from the original work plan approved in June 1998. The Experimental Design needs to include a discussion of these changes and their basis.